

Ackerman, Joyce

From: Ackerman, Joyce
Sent: Monday, March 26, 2018 4:28 PM
To: 'Richard Dean'; Jackie Rowley; Dave Folkes; Jonathan H. Steeler; Piggott, Amelia; Tobi L. Moore; Stovall - CDPHE, Curtis; david.walker@state.co.us
Subject: Neuhauser: data for soils in rolloff boxes

Dear Mr. Dean – I have been reviewing data for samples taken from soils stored in rolloff boxes at the site. It is EPA's understanding that Stratus intends to send the rolloff boxes to off-site disposal facilities such as the Waste Connections Subtitle D landfill nearby.

I noticed that some of the rolloff boxes of soil had samples taken and analyzed for the Toxicity Characteristic Leaching Procedure (TCLP), and some had not. If no TCLP analysis is conducted, the "20 times rule" can be used to determine whether it is impossible for a sample to fail the TCLP. For example, the TCLP threshold for trichloroethene is 0.5 mg/L. Multiplying that by 20 times is 10. Therefore, if a sample of soil were less than 10 mg/kg, it would not be physically possible for that sample to fail the TCLP.

Unfortunately, quite a few of the samples submitted to the laboratory required very high dilutions, ranging from 50 to 500. The high dilutions mean that the laboratory detections levels are likewise very high. For example, in one analysis where the dilution was 250, the reporting limit for TCE was 75 mg/kg and the method detection limit was 23 mg/kg. This detection level would not determine whether the sample contained TCE less than 10 mg/kg and therefore could not be used in a 20 time rule hazardous waste determination.

If waste is sent for off-site disposal, 40 CFR 262.11 requires a hazardous waste determination. It appears that there is not enough laboratory data for some of the rolloff boxes to satisfy this regulatory requirement. Additional sampling and analysis, i.e., TCLP, would be required for the hazardous waste determination.

Sincerely,

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